

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

Kimberly Edelstein,

Plaintiff,

v.

Case No. 1:17cv305

Judge Greg Stephens,

Judge Michael R. Barrett

Defendant.

INTERROGATORY ONE – FIRST AMENDMENT

YOU MUST UNANIMOUSLY AGREE ON THE ANSWERS TO THE FOLLOWING QUESTIONS:

1. Did Plaintiff prove by a preponderance of the evidence Defendant violated the First Amendment's Free Exercise clause under 42 U.S.C. § 1983?

Yes ✓ No

If your answer to Question 1 is Yes, please proceed to Question 2. If you answer to Question 1 is No, please stop here and sign below.

2. What amounts of damages, if any, did Plaintiff prove by a preponderance of the evidence were directly caused to her by Defendant's decision to terminate her employment?

a)	back pay	\$ <u>835,000</u>
b)	front pay	\$ <u>0</u>
c)	compensatory damages	\$ <u>250,000</u>

Please proceed to Question 3.

3. Did Defendant prove by a preponderance of the evidence that Plaintiff failed to mitigate her damages?

Yes _____

No ✓

If your answer to Question 3 is Yes, please proceed to answer Question 4. If your answer to Question 3 is No, please proceed to answer Question 5.

4. By what amount did Defendant prove by a preponderance of the evidence that your award of damages to Plaintiff should be reduced?

\$ 0

Please proceed to answer Question 5.

5. What amount of money, if any, do you award to Plaintiff as punitive damages against Defendant for conduct which was malicious or in reckless disregard of Plaintiff's rights as defined in the jury instructions?

\$ 35,000.00

Our answers to the foregoing Interrogatories are entered unanimously.

Date: 02/03/2023

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

Kimberly Edelstein,

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v.

Case No. 1:17cv305

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INTERROGATORY TWO – EQUAL PROTECTION AND OHIO LAW

YOU MUST UNANIMOUSLY AGREE ON THE ANSWERS TO THE FOLLOWING QUESTIONS:

1. Did Plaintiff prove by a preponderance of the evidence Defendant violated the Fourteenth Amendment's Equal Protection Clause under 42 U.S.C. § 1983 and Ohio Revised Code § 4112.02?

Yes _____

No ✓ _____

If your answer to Question 1 is Yes, please proceed to Question 2. If you answer to Question 1 is No, please stop here and sign below.

2. What amounts of damages, if any, did Plaintiff prove by a preponderance of the evidence were directly caused to her by Defendant's decision to terminate her employment?

- | | | |
|----|----------------------|----------|
| a) | back pay | \$ _____ |
| b) | front pay | \$ _____ |
| c) | compensatory damages | \$ _____ |

Please proceed to Question 3.

3. Did Defendant prove by a preponderance of the evidence that Plaintiff failed to mitigate her damages?

Yes _____ No _____

If your answer to Question 3 is Yes, please proceed to answer Question 4. If your answer to Question 3 is No, please proceed to answer Question 5.

4. By what amount did Defendant prove by a preponderance of the evidence that your award of damages to Plaintiff should be reduced?

\$ _____

Please proceed to answer Question 5.

5. What amount of money, if any, do you award to Plaintiff as punitive damages against Defendant for conduct which was malicious or in reckless disregard of Plaintiff's rights as defined in the jury instructions?

\$ _____

Our answers to the foregoing Interrogatories are entered unanimously.

Date: 02/03/2023

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

Kimberly Edelstein,

Plaintiff,

v.

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Judge Greg Stephens,

Judge Michael R. Barrett

Defendant.

GENERAL VERDICT FORM

On Plaintiff's claim under 42 U.S.C. § 1983 for alleged violation of the First Amendment's Free Exercise clause against Defendant, we find in favor of:

✓ Plaintiff OR _____ Defendant

On Plaintiff's claims under 42 U.S.C. § 1983 for alleged violation of the Fourteenth Amendment's Equal Protection Clause and religious discrimination under Ohio Revised Code § 4112.02 against Defendant, we find in favor of:

_____ Plaintiff OR ✓ Defendant

Executed in Cincinnati, Ohio, on this 03 day of February, 2023.